

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

FREEDOM FROM RELIGION)
FOUNDATION, INC., ANNE NICOL)
GAYLOR, ANNIE LAURIE GAYLOR,)
PAUL GAYLOR, DAN BARKER,)
PHYLLIS ROSE, and JILL DEAN,)

Plaintiffs,)

v.)

PRESIDENT BARACK OBAMA,)
WHITE HOUSE PRESS SECRETARY)
ROBERT L. GIBBS, WISCONSIN)
GOVERNOR JIM DOYLE, and SHIRLEY)
DOBSON, CHAIRMAN OF THE)
NATIONAL DAY OF PRAYER TASK)
FORCE,)

Defendants.)

Case No. 08-CV-588

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR FILING REPLY IN
SUPPORT OF DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT**

Defendant Shirley Dobson, acting by and through her respective undersigned counsel, Joel L. Oster, hereby seeks an extension of time through and including Friday, January 15, 2010, for defendants to file a reply in support of defendants' motions for summary judgment. On December 14, 2009, undersigned counsel contacted counsel for Plaintiffs, Richard L. Bolton, who indicated that he had no objection to the relief requested herein. As grounds for this motion, Defendant Dobson states as follows:

1. On December 10 and 11, 2009, Plaintiffs filed their responses to defendants' motions for summary judgment, rather than the original deadline of December 9, 2009, due to adverse weather conditions.

2. Plaintiffs' responses were quite large, including 284 proposed findings of facts and a 75 page brief.

3. Defendants' responses are due to the Court on December 23, 2009. However, the delayed filing of Plaintiffs' brief and the large nature of the filings, together with the holiday schedule, have created a burden on Defendant Dobson's counsel in adequately responding to Plaintiffs' Response Brief.

4. The trial date has been removed in this matter, as the parties intend for this matter to be fully presented to the court on briefs.

5. A due date of January 15, 2010 will allow defendants' counsel adequate time to respond in light of the holiday season that is upon us.

6. Accordingly, Defendant Dobson requests an extension of time to allow all defendants until January 15, 2010, to file reply briefs. Granting an extension would not prejudice any of the parties in this litigation.

WHEREFORE, Defendant Dobson respectfully requests that the Court grant an extension of time through and including January 15, 2010, for defendants to file reply briefs in support of their motions for summary judgment.

Dated: December 16, 2009

Respectfully submitted,

Alan E. Sears, Esq
Benjamin W. Bull, Esq.
ALLIANCE DEFENSE FUND
15100 N. 90th Street
Scottsdale, Arizona
Tel: (480) 444-0020
Fax: (480) 444-0025

/s/Joel Oster
Joel Oster, KS Bar 18547
Kevin Theriot, KS Bar 21565
ALLIANCE DEFENSE FUND
15192 Rosewood
Leawood, KS 66224
Tel: (913) 685-8000
Fax: (913) 685-8001
joster@telladf.org

COUNSEL FOR DEFENDANT SHIRLEY DOBSON

CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2009, I electronically filed a copy of the above using the ECF System for the Western District of Wisconsin, which will send notification of that filing to all counsel in this litigation who have entered an appearance, including counsel for plaintiffs.

/s/Joel Oster
Joel Oster